

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) **Case No. 21-21338-CMB**
Denise M. Campbell,)
 Debtor,) **Chapter 13**
Denise M. Campbell,)
 Movant,) **Related Document No. 71-51**
 vs.) **Hearing Date: 05/19/22 @ 11:00 a.m.**
Specialized Loan Servicing, Inc.,)
 Respondent.) **Document No.**

STATUS REPORT

AND NOW, comes the Debtor, Denise M. Campbell, by and through her attorneys,
Mark B. Peduto and Calaiaro Valencik, and presents the following Status Report:

1. Denise M. Campbell filed a bankruptcy under Chapter 13 of the United States Bankruptcy Code on June 4, 2021, at Case No. 21-21338-CMB in an attempt to reorganize her debts.
2. The Debtor filed a Motion for Loss Mitigation on August 18, 2021. (Doc. #31)
3. A Loss Mitigation Order was entered on September 2, 2021. (Doc. #35)
4. The Debtor submitted a Core LMP Package to the Default Mitigation Management Portal on September 2, 2021, using the registered servicer, Specialized Loan Servicing (“SLS”).
5. Counsel for the Debtor received a denial letter from SLS dated September 21, 2021.
6. On September 28, 2021, Debtor’s counsel uploaded a letter to the DMM Portal requesting SLS conduct a second independent review.
7. The Debtor received a second denial letter from SLS dated October 27,

2021.

8. The Debtor filed a Loss Mitigation Status Report on November 1, 2021. (Doc. #50)

9. The Debtor filed a Motion to Compel and for Sanctions on November 8, 2021. (Doc. #51)

10. A hearing on Debtor's Motion to Compel and for Sanctions was scheduled for December 15, 2021, at 1:30 p.m. with responses due by November 25, 2021. (Doc. #52)

11. SLS filed a Response to Debtor's Motion to Compel and for Sanctions on November 24, 2021, 2021. (Doc. #53)

12. On December 15, 2021, the Court held a hearing on the Debtors' a Motion to Compel and for Sanctions.

13. Counsel for SLS offered a potential resolution, and with the consent of all parties, the hearing on the Debtor's Motion to Compel and for Sanctions was continued to January 25, 2022, at 10:00 a.m.

14. The Debtor filed a Motion to Extend the Loss Mitigation Period on December 30, 2021. (Doc. #58)

15. An Order was entered on January 12, 2022 (Doc. #63) extending the loss mitigation period up to and including March 15, 2022.

16. A Consent Motion to reschedule the hearing scheduled for January 25, 2022, on Debtor's Motion to Compel and for Sanctions was filed on January 18, 2022. (Doc. #65)

17. The hearing on Debtor's Motion to Compel and for Sanctions was

rescheduled to March 22, 2022, at 10:00 a.m. by Order entered on January 19, 2022.
(Doc. #66)

18. At the hearing held on March 22, 2022, Counsel for the Debtor and SLS reported that the parties are attempting to work out matters. It was ordered that Debtor's counsel file a Status Report on or before May 2, 2022, and the hearing on Debtor's Motion to Compel and for Sanctions was continued to May 19, 2022, at 11:00 a.m.

19. The Debtor filed a Motion to Extend the Loss Mitigation Period on March 15, 2022. (Doc. #70)

20. An Order was entered on March 29, 2022 (Doc. #73) extending the loss mitigation period up to and including May 16, 2022.

21. The Debtor uploaded an updated loss mitigation application on January 21, 2022, and proof of income on April 5, 2022, to the portal and the application is still under review.

Respectfully submitted,

DATED: May 2, 2022

BY: /s/ Mark B. Peduto
Mark B. Peduto, Esquire
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| IN RE: |) Case No. 21-21338-CMB |
| Denise M. Campbell, |) |
| Debtor, |) Chapter 13 |
| Denise M. Campbell, |) |
| Movant, |) Related Document No. 71-51 |
| vs. |) Hearing Date: 05/19/22 @ 11:00 a.m. |
| Specialized Loan Servicing, Inc., |) |
| Respondent. |) Document No. |

CERTIFICATE OF SERVICE OF Status Report

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on May 2, 2022.

SERVICE BY E-MAIL:

Rebecca A. Solarz, Esquire; RSolarz@kmlawgroup.com

SERVICE BY NEF:

Brian Nicholas on behalf of Creditor The Bank of New York Mellon Trust Company, fka The Bank of New York Trust Company as Successor to JP Morgan Chase Bank N.A. as Successor to Bank One N.A. as Trustee for Asset Backed Funding Corporatio

bnicholas@kmlawgroup.com

Office of the United States Trustee; ustpreion03.pi.ecf@usdoj.gov

Ronda J. Winnecour; cmecf@chapter13trusteedpa.com

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Electronic Notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: May 2, 2022

/s/ Mark B. Peduto
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